

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION AT AKRON**

ADVANTUS, CORP., *et al.*,

Plaintiffs,

v.

MICHAEL PRENDERGAST, *et al.*,

Defendants.

Case No. 5:25-cv-01250-JRA

Judge John R. Adams

MOTION FOR ADMISSION *PRO HAC VICE* OF JOHN C. GOODCHILD, III

Pursuant to Local Rule 83.5(h) of the Rules of the United States District Court for the Northern District of Ohio, Defendants Michael Prendergast and Jeffrey Dwyer (“Defendants”), move this Court to grant leave for attorney John C. Goodchild, III to appear *pro hac vice* in this action on their behalf. In support of this Motion, the undersigned asserts the following:

1. Mr. Goodchild, III is an attorney with Morgan, Lewis & Bockius LLP, and his business address is 2222 Market Street, Philadelphia, PA 19103. His telephone number is (215) 963-5020, his fax number is (215) 963-5001, and his email address is john.goodchild@morganlewis.com.

2. The Declaration of Mr. Goodchild, III, which is offered in support of this Motion and contains the specific information required by Local Rule 83.5(h), is attached hereto as **Exhibit A**.

3. As noted in his Declaration, Mr. Goodchild, III is a member in good standing of the courts in which he is admitted. Furthermore, no disciplinary proceedings have been filed or are pending against him, and he has not been disbarred from practice before any court, department,

bureau or commission or any state or the United States of America. Also, as noted in his Declaration, Mr. Goodchild, III has never received any reprimands from any such court, department, bureau or commission pertaining to conduct or fitness as a member of any bar.

4. The undersigned is tendering the required filing fee with this Motion.

WHEREFORE, Defendants respectfully request that this Court grant attorney John C. Goodchild, III limited admission to appear in this Court *pro hac vice* on their behalf.

Dated: June 17, 2025

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

/s/ Wendy West Feinstein

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*Counsel for Defendants Michael Prendergast
and Jeffrey Dwyer*

CERTIFICATE OF SERVICE

I, Matthew H. Sepp, an attorney, certify that on June 17, 2025, I caused a copy of the foregoing to be filed with the Clerk of the Court using the Court's CM/ECF electronic filing system, which will provide electronic notice to all counsel of record.

/s/ Matthew H. Sepp
Matthew H. Sepp